

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE APACHE CORP. SECURITIES
LITIGATION

Case No. 4:21-cv-00575

District Judge George C. Hanks, Jr.

Magistrate Judge Andrew M. Edison

CLASS ACTION

**[PROPOSED] ORDER GRANTING
LEAD PLAINTIFFS' MOTION FOR CLASS CERTIFICATION AND
APPOINTMENT OF CLASS REPRESENTATIVES AND CLASS COUNSEL**

Pending before the Court is the motion filed by Lead Plaintiffs Plymouth County Retirement Association and the Trustees of the Teamsters Union No. 142 Pension Fund (together, "Lead Plaintiffs" or "Plaintiffs"), to certify the above-captioned action (the "Action") as a class action pursuant to Rule 23 of the Federal Rules of Civil Procedure, appoint Lead Plaintiffs as Class Representatives, and appoint Lead Counsel Saxena White P.A. ("Saxena White") and Kessler Topaz Meltzer & Check, LLP ("KTMC") as Class Counsel and Ajamie LLP ("Ajamie LLP") as Liaison Class Counsel (the "Motion").

Having considered Lead Plaintiffs' Motion, the papers and arguments submitted in support of and in opposition to the Motion, and good cause having been shown, the Court hereby GRANTS the Motion.

The Court finds, pursuant to Federal Rule of Civil Procedure 23(a) that: (i) the Class (as hereinafter defined) is so numerous that joinder of all members is impracticable; (ii) there are questions of law and fact common to the Class; and (iii) Lead Plaintiffs' claims are typical of the Class claims.

The Court further finds that Lead Plaintiffs will fairly and adequately protect the interests of the Class as Class Representatives.

Pursuant to Federal Rule of Civil Procedure 23(b)(3), the Court further finds that questions of law or fact common to members of the Class predominate over any questions affecting only individual members, and that a class action is superior to other available methods for fairly and efficiently adjudicating this controversy.

The Court further finds, pursuant to Federal Rule of Civil Procedure 23(g), that proposed Class Counsel, Saxena White and KTMC, and proposed Liaison Class Counsel, Ajamie LLP, will fairly and adequately represent the interests of the Class.

IT IS HEREBY ORDERED THAT:

1. The Action is hereby certified to proceed as a class action pursuant to Federal Rules of Civil Procedure 23(a) and (b)(3) on behalf of a Class that is defined as follows:

All persons or entities who purchased or otherwise acquired Apache Corporation (“Apache”) common stock from September 7, 2016, through March 13, 2020, inclusive (the “Class Period”), and were damaged thereby. Excluded from the Class are Defendants, the officers and directors of Apache, members of their immediate families and their legal representatives, heirs, agents, affiliates, successors or assigns, Defendants’ liability insurance carriers, and any affiliates or subsidiaries thereof, and any entity in which Defendants or their immediate families have or had a controlling interest.

2. Lead Plaintiffs Plymouth County Retirement Association and the Trustees of the Teamsters Union No. 142 Pension Fund are appointed as Class Representatives pursuant to Federal Rule of Civil Procedure 23(a); and

3. Saxena White and KTMC are appointed as Class Counsel and Ajamie LLP is appointed as Liaison Class Counsel pursuant to Federal Rule of Civil Procedure 23(g).
IT IS SO ORDERED.

Dated: _____

THE HONORABLE GEORGE C. HANKS, JR.
UNITED STATES DISTRICT JUDGE